

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

DR. IRAKLI GLONTI and DAVID DATESHIDZE,

Plaintiffs,

- against -

07 CV 10975 (CM)

LEHMAN BROTHERS, INC. and  
RBC DAIN RAUSCHER, INC.

Defendants.

-----X

Geoffrey Valentino, Esq., hereby declares under penalty of perjury:

1. I am a Vice President of defendant Lehman Brothers, Inc., and I submit this declaration in support of Lehman Brothers' motion to stay the claims against it in the Complaint and compel them to arbitration.

2. Annexed hereto as Exhibit A is a true and correct copy of an email dated February 6, 2001 sent by Irakli Glonti to Frank Foerster and written in English regarding a "project with the Chief of Staff of the office of the President of Ghana."

Dated: New York, New York  
January 17, 2008

  
Geoffrey Valentino

Exhibit A

**Valentino, Geoffrey**

---

**From:** Irakli Glonti [ekogl@mail.ru]  
**Sent:** Tuesday, February 06, 2001 1:08 PM  
**To:** Foerster, Frank  
**Subject:** Fw:

----- Original Message -----

**From:** Irakli Glonti  
**To:** Frank Foerster  
**Sent:** Tuesday, February 06, 2001 8:28 PM

> > Dear Beno,  
> Thank you very much for your mail.  
> I've read it with attention and I found it very interesting.  
> I've already talk about this project with the Chief of Staff of the  
> office of the President of Ghana, who has expressed his great concern  
> about the issue.  
> I have previously obtained appointments with the Ministers of Finance,  
> Foreign Affairs and the Governor of Bank of Ghana, in this occasion  
> would have been much appreciated if this subject could be introduced  
> for their envision.  
> Having said this implies, your immediate responds to the below  
> suggestions that gives a headway and a clear picture of whatever  
> negotiations we are talking about.  
> 1- A clear indication through e-mail, a detail info about the general  
> condition of the foreseeable relationship that need to be in place in  
> Ghana and the Lehman Brothers.  
> 2- A letter proving that I am recognized in Lehman Brothers as  
> negotiator or similar to the meaning.  
> 3- Clearly state the fiscal status of the possible intention so as to  
> enable me talk as a credible gentleman as I am well introduced to the  
> Ghanaian system. Hence command respect at the authority level.  
> 4- In this regards I will want to charge you with an urgent matter of  
> answering to this aboved stated issues so that we will be doing the  
> right thing that demonstrate what they know me to be in Ghana.  
> 5- In case of further information about me and relationship with the  
> Government of Ghana, Lehman Brothers can contact:  
> A) Mr. Ramadan Assistant of the President of Ghana  
> B) Mr. Kwodwo O. MPiani Special Assistant of President  
> C) Hon. Hackman Owusu Minister of Foreign Affairs  
> D) Etc..  
> Let me again congratulate you for all you thought of me and I believe  
> it is seen as a investment input as my first positive meeting I had  
> just after I received your e-mail.  
> I've to go right here and with much regards from a very hot weather in  
> sunshine Accra.